

DAVID L. ANDERSON (CABN 149604)
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

JOHN H. HEMANN (CABN 165823)
SHIAO C. LEE (CABN 257413)
Assistant United States Attorneys

450 Golden Gate Avenue, 9th Floor
San Francisco, California 94102-3495
Telephone: (415) 436-6924
FAX: (415) 436-7234
John.hemann@usdoj.gov
Shiao.lee@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 18-465 MMC
)	
Plaintiff,)	DECLARATION OF SHIAO LEE IN SUPPORT OF
)	UNITED STATES' RESPONSE TO JINHUA'S
v.)	MOTION FOR A BILL OF PARTICULARS
)	
UNITED MICROELECTONICS)	Date: February 6, 2019
CORPORATION, INC.; FUJIAN JINHUA)	Time: 2:15 p.m.
INTEGRATED CIRCUIT, CO., LTD.; CHEN)	
ZHENGKUN, a.k.a. STEPHEN CHEN; HE)	
JIANTING, a.k.a. J.T. HO; and WANG)	
YUNGMING, a.k.a. KENNY WANG.)	
)	
Defendants.)	

I, Shiao Lee, declare as follows:

- I am one of the Assistant United States Attorneys assigned to the prosecution of the above-captioned case.
- I am knowledgeable about the government's production of discovery to Fujian Jinhua Integrated Circuit Co. Ltd. ("Jinhua"). I have also reviewed the record of discovery production that has been

maintained by my office.

3. The government has produced a preliminary amount of discovery to Jinhua.

4. On January 11, 2019, the government produced approximately 629 pages of discovery, which included:

- 31 interview transcripts;
- Instant messaging communications between defendants J.T. Ho and Kenny Wang;
- A transcript of the Taiwan Ministry of Justice's surveillance of Kenny Wang's telephone;
- A letter and Confidentiality and Intellectual Property Agreement between J.T. Ho and Micron Memory Taiwan;
- Micron emails related to Kenny Wang;
- A Micron summary forensic report of Kenny Wang's company laptop with attachments;
- Documentation related to the recruiting event that took place in October 2016 in the Northern District of California, including a video file, still photographs, FBI 302 report, Micron report, and PDF scans of brochures and business cards obtained at the event; and
- Open source articles.

5. The government intends to produce additional discovery in its possession after a protective order is entered. The additional discovery will include, but is not limited to, additional interview transcripts; over 100 hours of audio and video recordings from interviews; a copy of materials submitted to the Taiwan Ministry of Economics by United Microelectronics Corporation Inc. ("UMC") for its Technical Collaboration with Jinhua; additional attachments and records obtained from Taiwan authorities; results from search warrants, results from 2703(d) orders; FBI 302 reports; a list of over 250,000 file names referencing files located on devices seized by the Taiwan Ministry of Justice Investigation Bureau; documents obtained from Micron Technology, Inc.; documents obtained from LAM Research; and the results of email subscriber records requests from internet service providers.

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1 I declare under penalty of perjury that the foregoing is true to the best of my knowledge and
2 recollection. Executed this 30th day of January 2019 at San Francisco, California.

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4 /s/
SHIAO C. LEE
5 Assistant United States Attorney
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